

Robert Horowitz (*admitted pro hac vice*)
Jason H. Kislin, Esq. (033332003)
Jaclyn DeMais, Esq. (071692013)
GREENBERG TRAURIG, LLP
500 Campus Drive, Suite 400
Florham Park, New Jersey 07932
Tel: (973) 360-7900
*Attorneys for Defendants Tingo Group, Inc.,
Dozy Mmobuosi, Darren Mercer,
And Kevin Chen*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

CHRISTOPHER ARBOUR, Individually and
on behalf of all others similarly situated,

Plaintiff,

v.

TINGO GROUP, INC., DOZY MMOBUOSI,
DARREN MERCER, and KEVIN CHEN,

Defendants.

MARK J. BLOEDORN, Individually and on
behalf of all others similarly situated,

Plaintiff,

v.

TINGO GROUP, INC., DARREN MERCER,
HAO (KEVIN) CHEN, and DOZY
MMOBUSI

Defendants.

Civil Action No. 2:23-cv-03151-ES-MAH

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**NOTICE OF MOTION
TO WITHDRAW AS COUNSEL**

PLEASE TAKE NOTICE that on May 13, 2024, or soon thereafter as counsel may be heard,
the undersigned attorneys for Defendants Tingo Group, Inc., Dozy Mmobuosi, Darren Mercer and

Kevin Chen (collectively, “Defendants”) shall move before the United States District Court for the District of New Jersey, for an Order granting Greenberg Traurig, LLP’s motion to withdraw as counsel.

PLEASE TAKE FURTHER NOTICE that in support of this Motion Counsel submits the accompany Memorandum of Law and Declaration of Robert A. Horowitz, Esq.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is also submitted herewith.

GREENBERG TRAURIG, LLP

Dated: April 19, 2024

By: /s/ Jason H. Kislin
Jason H. Kislin
Robert Horowitz (*admitted pro hac vice*)
Jaclyn DeMais
500 Campus Drive, Suite 400
Florham Park, NJ 07932
Phone: (973) 360-7900
Facsimile: (973) 301-8410
kislinj@gtlaw.com

Attorneys for Defendants

CERTIFICATION OF SERVICE

I hereby certify that on April 19, 2024, I caused the foregoing Notice of Motion to Withdraw as Counsel, the Memorandum of Law and Declaration in support, and Proposed Order to be electronically filed with the Court using CM/ECF system and served copies of the same via email to following:

Tingo Group, Inc.
Dozy Mmobuosi
Darren Mercer
Kevin Chen

Dated: April 19, 2024

/s/ Jason H. Kislin

Jason H. Kislin